

Exhibit 2

From: [Goldberg, Seth A.](#)
To: [Cheryll Calderon](#); [Priselac, Jessica](#); [Schwartz, Barbara](#); [Hill, Coleen W.](#); [Ball, Frederick R.](#); [Gallagher, Patrick](#)
Cc: [Adam Slater](#); [behram.parekh@drlawllp.com](#); [Christopher Geddis](#); [Layne Hilton](#); [George Williamson](#)
Subject: RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation; No. 1:19-md-02875
Date: Friday, April 9, 2021 11:59:37 AM
Attachments: [Goldberg S. ltr re Mandarin translated documents 4.7.21.pdf](#)

Counsel,

Thank you for the attached letter. We do not believe Judge Vanaskie ordered the ZHP Parties to identify translations in their production as you have suggested in your letter, and we do not have metadata that connects English documents to Chinese translations.

Best regards,
Seth



From: Cheryll Calderon <ccalderon@mazieslater.com>
Sent: Wednesday, April 7, 2021 6:43 PM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Ball, Frederick R. <FRBall@duanemorris.com>; Gallagher, Patrick <PCGallagher@duanemorris.com>
Cc: Adam Slater <ASlater@mazieslater.com>; behram.parekh@drlawllp.com; Christopher Geddis <CGeddis@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>; George Williamson <gwilliamson@farr.com>
Subject: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation; No. 1:19-md-02875

Counsel:

Please see the attached correspondence regarding the above referenced matter.

Thank you,
Cheryll

Cheryll A. Calderon, Esq.

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